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Tom A. Howley, State Bar No. 24010115 JONES DAY

717 Texas Avenue, Suite 3300 Houston, Texas 77002 Telephone: (832) 239-3939 tahowley@jonesday.com

Brad B. Erens (admitted *pro hac vice*)
Joseph A. Florczak (admitted *pro hac vice*)
JONES DAY
77 West Wacker
Chicago, Illinois 60601
Telephone: (312) 782-3939
bberens@jonesday.com
jflorczak@jonesday.com

PROPOSED ATTORNEYS FOR DEBTORS

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re: § Chapter 11

§

ERG Intermediate Holdings, LLC, et al., Jointly Administered

§

Debtors. § Case No.: 15-31858-hdh-11

AMENDED NOTICE OF HEARING

PLEASE TAKE NOTICE that, on May 1, 2015, the above-captioned debtors (the "Debtors") filed the Motion of the Debtors for an Order (I) Authorizing Them to Pay Certain Prepetition Obligations on Account of Royalties, Overriding Royalty Interests, Working Interest Owner Payments and Severance Taxes and (II) Authorizing Banks to Honor and Process Related Checks and Electronic Transfers [Docket No. 14] (the "Royalty Motion") in connection with these chapter 11 cases.

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The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

PLEASE TAKE FURTHER NOTICE that, on May 6, 2015, the Court entered an order granting certain of the relief sought pursuant to the Royalty Motion with regard to severance taxes and royalties in Texas [Docket No. 51].

PLEASE TAKE FURTHER NOTICE, that a hearing to consider the remaining relief requested in the Royalty Motion had been scheduled and noticed for a hearing on May 22, 2015 [Docket No. 59].

PLEASE TAKE FURTHER NOTICE, that the hearing to consider the remaining relief requested in the Royalty Motion has been rescheduled and will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on June 9, 2015 at 11:00 a.m. (CDT), or at such other time as the court may determine.

PLEASE TAKE FURTHER NOTICE that any objections or other responses (collectively, "Objections") must be filed on or before June 2, 2015 (the "Objection Deadline") with the Clerk of the Bankruptcy Court for the Northern District of Texas (the "Clerk's Office"), Earle Cabell Federal Building, 1100 Commerce St., Rm. 1254, Dallas, TX 75242-1496. At the same time, you must serve a copy of the Objection upon the most current Service List filed with the Court pursuant to the Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 61]. Objections must be so served so as to actually be received by the parties on the Service List by the Objection Deadline.

Dated: May 21, 2015

Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

Tom A. Howley JONES DAY 717 Texas Avenue, Suite 3300 Houston, Texas 77002 Telephone: (832) 239-3939 tahowley@jonesday.com

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